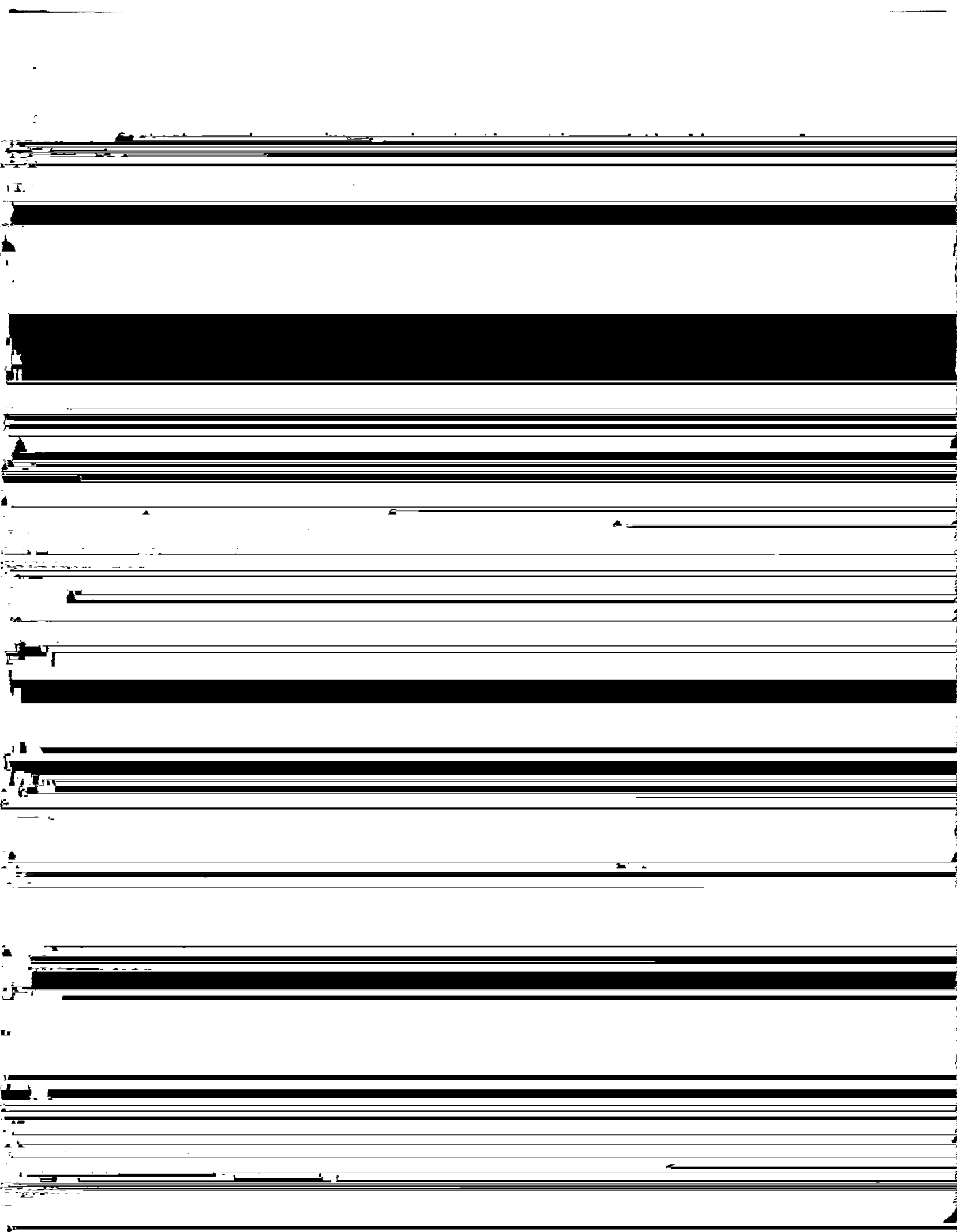


Paging Network, Inc., by its attorneys, and pursuant to Section 1.415 of the Commission's rules, 47 C.F.R. § 1.415, hereby replies to comments on the Commission's Notice of Proposed Rulemaking in the captioned docket ("Notice"). Through this Notice the Commission is proposing to increase permissible power at common carrier paging stations in the 931 MHz band to 3500



necessary to avoid serious consequences that would flow from the elimination of the height/power provisions contained in present Section 22.505(b). PageNet recommended other changes in the rules relating to power computation and modification of facilities.

Commenters were, with one exception, in favor of the Commission's proposal to increase base station power limits to a maximum of 3500 watts. Only the Utilities Telecommunications Council ("UTC") opposed the increase, citing potential interference to multiple address systems ("MAS") operating at 928 and 932 MHz.<sup>2</sup> Based on its extensive experience both in operating high powered (i.e., greater than 1000 watt) 931 MHz base stations and as the licensee of control facilities operating at 928 MHz, PageNet believes that UTC's fears are unwarranted.<sup>3</sup> PageNet therefore reaffirms its support for the proposal to increase power limits to 3500 watts and the related recommendations contained in its Comments.

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<sup>2</sup> Comments of Utilities Telecommunications Council ("UTC Comments"). The interference which concerns UTC is understood to be that which would affect receivers at points of communication for the 928 and 932 MHz systems.

<sup>3</sup> There are currently no systems operating in the 932 MHz band. Licensing of government and non-government (i.e., common carrier and private radio) systems at 932 MHz has not yet begun and is expected to commence shortly, based on computerized lottery procedures. Conversation of PageNet counsel with Frank Wright, Chief, Frequency Liaison Branch, Spectrum Engineering Division, Office of Engineering and Technology, July 2, 1993.

## II. DISCUSSION

As noted in its Comments, PageNet currently operates stations in markets throughout the country at powers in excess of 1000 watts.<sup>4</sup> Indeed, in practically every market in which it holds common carrier paging licenses, PageNet operates stations at the higher powers -- a total of several hundred such stations.<sup>5</sup> That experience confirms the advantages of the increased power. It also has shown that interference to 928 MHz MAS receivers as a result of such operations has been very rare and always

proximity with one another, site managers often require new tenants to perform, or will offer to do for them, an intermodulation study so that transmission systems may be designed in a way that anticipates and avoids the effects of interference. The type of interference which is of concern to UTC, is, in other words, foreseeable, preventable and correctable at nominal cost.<sup>6</sup>

In addition to operating high powered stations co-located or in proximity to 928 MHz MAS receivers without serious difficulty, PageNet is itself the licensee of 928 MHz control stations which it operates at the same location as its own high-powered 931 MHz base stations.<sup>7</sup> Clearly PageNet would not favor a rule change that would result in harm to its own operations. But, more importantly, its experience operating 928 MHz receivers and co-located 931 MHz base stations has been that undesired effects are not a common occurrence.<sup>8</sup> In those few instances where interference does occur, cooperation between licensees has been adequate to diagnose and resolve the difficulty.

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<sup>6</sup> Commonly available filters effective in resolving such interference cost in the range of \$300-\$700.

<sup>7</sup> This is true, for example, in PageNet's common carrier paging system in the Houston, Texas area.

<sup>8</sup> PageNet is also the licensee of many hundreds of 929 MHz Private Carrier Paging facilities operating co-located with 928 MHz receivers and has found that instances of interference to the 928 MHz receivers are rare and generally routinely resolvable. The greater spectral separation between 928 and 931 MHz operations makes it highly unlikely that interference would not be curable, if it occurred, through use of cavity filters and other standard engineering approaches.

UTC recommends that the Commission "adopt a method whereby the parties are required to cooperate to reduce or eliminate interference" and that paging applicants be required to contact the licensees of all MAS master stations located within one mile of any proposed high power paging station.<sup>9</sup> As just noted above, PageNet's experience in dealing with problems of interference that arise at crowded transmission sites, is that licensees indeed do cooperate to resolve those problems, and PageNet has done so at its own expense where appropriate.<sup>10</sup> There is no apparent need for the Commission to adopt a specific rule requirement to assure that these cooperative efforts continue.

With respect to UTC's suggestion that paging applicants

would add unnecessarily to the burden of the paging applicant to no apparent positive end. Therefore PageNet objects to UTC's recommendation.<sup>11</sup>

### III. CONCLUSION

PageNet supports the Commission's proposal to allow 3500 watt operation of all stations licensed in the 931 MHz band. While avoidance of interference at transmission sites that are likely to be shared by numerous facilities licensed in a multitude of services is entirely appropriate, PageNet's experience has been that interference to MAS stations currently licensed in the 928 MHz band and those that will be licensed in the future in the 932 MHz band is a rarity and that it is, in any event, foreseeable, preventable and resolvable. PageNet therefore continues to

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<sup>11</sup> It should be noted that with respect to the future licensing

recommend adoption of the proposed rules, modified in accordance with the suggestions it set forth in its earlier Comments.

Respectfully submitted,

PAGING NETWORK, INC.

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Dated: July 2, 1993



CERTIFICATE OF SERVICE

I, Lila Mitkiewicz, hereby certify that the foregoing Reply Comments of Paging Network, Inc. was forwarded this 2nd day of July, 1993, by depositing copies thereof in the United States mail, postage prepaid to the following individuals:

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